

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re: Dawn Kane : Bankruptcy No. 16-10659

Debtor : Chapter 13

MOTION FOR POST-CONFIRMATION MODIFICATION OF CHAPTER 13 PLAN

Pursuant to Section 1329 of the U.S. Bankruptcy Code and Local Rule 3015-2(b)(1), debtor, by and through her attorneys, Jeanne Marie Cella and Associates, LLC represents as follows:

1. The debtor is seeking a post-confirmation modification (not Cares Act) and the Trustee has no objection to the modification and proposed 4th Amended Chapter 13 Plan.
2. On February 1, 2016 debtor filed for protection under Chapter 13 of the United States Bankruptcy Code.
3. On January 18, 2018 this Honorable Court entered an order confirming debtor's 3rd Amended Chapter 13 Plan. A copy of the order is attached hereto as Exhibit "A" and a copy of the confirmed 3rd Amended Chapter 13 Plan is attached hereto as Exhibit "B". As confirmed, the debtor's plan requires a payment of \$1,161.72 and provides that any funds remaining after the priority claims and secured claim arrearages have been cured will be paid to unsecured creditors on a pro-rata basis.
4. The debtor has had a change in circumstances since her income has been reduced from \$8,818.33 per month to \$8,064.33 per month, due to lower sales. She now has disposable income of \$924.99, which debtor proposes to pay in her proposed 4th Amended Plan. Attached as Exhibit "C" are Amended Schedule's I and J. Attached as Exhibit "D" are the debtor's current income records.

5. A copy of debtor's proposed 4th Amended Plan requiring a payment of her new disposable income of \$924.99 is attached hereto as Exhibit "E".
6. The Trustee's report indicates that debtor has paid all administrative, priority, and secured claims and is currently paying unsecured creditors.

WHEREFORE, Debtor moves this Honorable Court for the entry of an Order granting Debtor's Motion to modify post-confirmation.

Respectfully Submitted,

Jeanne Marie Cella and Associates, LLC

Jeanne Marie Cella, Esquire
Jeanne Marie Cella, Esquire
Attorney for Debtor

Dated: May 12, 2020